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Attorney for Defendant
Jonathan Astorga Madrigal

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE THOMAS WHELAN)

UNITED STATES OF AMERICA,

Plaintiff,

v.

JONATHAN ASTORGA MADRIGAL,

Defendant.

Case No. 07-CR-3270-W

Date: March 10, 2008
Time: 2:00 P.M.

NOTICE OF MOTIONS AND
MOTIONS TO:
1) COMPEL DISCOVERY;
AND
2) LEAVE TO FILE FURTHER
MOTIONS

TO: KAREN HEWITT, UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on Monday , March 10, 2008, at 2:00 P.M.,
or as soon thereafter as counsel may be heard, the defendant, Jonathan
Astorga Madrigal, by and through counsel, LEE PLUMMER will ask this
Court to issue an order granting the motions listed below.

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MOTIONS

The defendant, Jonathan Astorga Madrigal, by and through counsel, LEE PLUMMER, asks this Court pursuant to the Fifth and Sixth Amendments, to the United States Constitution, Fed. R. Crim. P. 12, 16 and 26, and all other applicable statutes and local rules for an order to:

- 1) Compel Discovery; and
- 2) Leave to File Further Motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials that may come to this Court's attention prior to or during the hearing of these motions.

Respectfully submitted,

Dated: February 11, 2008

/s/ Lee Plummer
Attorney for Defendant